

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO.: 05-CV-11117-REK

RUTH HEINE

Plaintiff

v.

PARKWAY AUTO REALISATIONS, L.L.C.,
f/k/a AUTO EUROPE, L.L.C.,
d/b/a AUTO EUROPE

Defendant

JOINT MOTION TO EXTEND FACT DISCOVERY TO MAY 31, 2006

NOW COME the parties in the above-entitled matter and respectfully seek leave to extend the deadline by which to complete fact discovery to May 31, 2006. As grounds therefore, the parties state as follows:

1. The Court adopted the parties Joint Statement's plan for discovery. That plan included a deadline by which to complete fact discovery of March 31, 2006 and an overall discovery deadline of May 31, 2006.
2. Due to trial schedules of both counsel, and to travel schedules of the parties, the parties were unable to complete fact discovery by March 31, 2006.
3. The parties do contemplate that they will be able to complete all discovery by May 31, 2006 without disturbing the pre-trial and trial dates or any other aspect of the scheduling in this case.

WHEREFORE, the parties seek leave to extend the fact discovery deadline to May 31, 2006.

Respectfully submitted,

For the plaintiff,

/s/ Sol J. Cohen
Sol J. Cohen
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For the defendant,

/s/ Ella Brown
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